

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

LEAGUE OF UNITED LATIN)
AMERICAN CITIZENS, SOUTHWEST)
VOTER REGISTRATION EDUCATION)
PROJECT, MI FAMILIA VOTA,)
AMERICAN GI FORUM, LA UNION)
DEL PUEBLO ENTERO, MEXICAN)
AMERICAN BAR ASSOCIATION OF)
TEXAS, TEXAS HISPANICS)
ORGANIZED FOR POLITICAL)
EDUCATION, WILLIAM C.)
VELASQUEZ INSTITUTE, FIEL)
HOUSTON INC., TEXAS)
ASSOCIATION OF LATINO)
ADMINISTRATORS AND)
SUPERINTENDENTS, EMELDA)
MENENDEZ, GILBERTO MENENDEZ,)
JOSE OLIVARES, FLORINDA)
CHAVEZ, and JOEY CARDENAS,)
)
Plaintiffs,)
v.)

CIVIL ACTION NO.
3:21-cv-00259
[Lead case]

GREG ABBOTT, in his official capacity as)
Governor of the State of Texas; JOSE A.)
ESPARZA, in his official capacity as Deputy)
Secretary of the State of Texas,)
)
Defendants.)

DAMON JAMES WILSON, for himself)
and on behalf of all others similarly situated,)
)
Plaintiffs,)
v.)

CIVIL ACTION NO.
1:21-cv-00943
[Consolidated case]

STATE OF TEXAS, GREG ABBOTT, in)
his official capacity as Governor of the State)
of Texas, TEXAS SPEAKER DADE)
PHELAN, in his official capacity as Speaker)
of the Texas House or Representatives,)
TEXAS LIEUTENANT GOVERNOR)

DAN PATRICK, in his official capacity as)
Lieutenant Governor and Presiding Officer of)
the Texas Senate, and JOSE A. ESPARZA,)
in his official capacity as Deputy Secretary of)
the State of Texas,)
)

Defendants.

VOTO LATINO, ROSALINDA RAMOS)
ABUABARA, AKILAH BACY,)
ORLANDO FLORES, MARILENA)
GARZA, CECILIA GONZALES,)
AGUSTIN LOREDO, CINIA MONTOYA,)
ANA RAMÓN, JANA LYNNE SANCHEZ,)
JERRY SHAFER, DEBBIE LYNN SOLIS,)
ANGEL ULLOA, and MARY URIBE,)

Plaintiffs,

v.

JOHN SCOTT, in his official capacity as)
Texas Secretary of State, and GREGORY)
WAYNE ABBOTT, in his official capacity)
as the Governor of Texas,)
)

Defendants.

CIVIL ACTION NO.
1:21-cv-00965
[Consolidated case]

MEXICAN AMERICAN LEGISLATIVE)
CAUCUS, TEXAS HOUSE OF)
REPRESENTATIVES,)
)

Plaintiffs,

v.

STATE OF TEXAS, GREG ABBOTT,)
GOVERNOR OF THE)
STATE OF TEXAS, in his official capacity,)
and JOHN SCOTT, SECRETARY OF)
STATE OF TEXAS, in his official capacity,)
)

Defendants.

CIVIL ACTION NO.
1:21-cv-00988
[Consolidated case]

ROY CHARLES BROOKS, FELIPE
GUTIERREZ, PHYLLIS GOINES, EVA
BONILLA, CLARA FAULKNER,
DEBORAH SPELL, and BEVERLY
POWELL,

Plaintiffs,

v.

GREG ABBOTT, in his official capacity as
Governor of Texas; JOHN SCOTT, in his
official capacity as Secretary of State of
Texas,

Defendants.

CIVIL ACTION NO.
1:21-cv-0099
[Consolidated case]

TEXAS STATE CONFERENCE OF
THE NAACP,

Plaintiff,

v.

GREG ABBOTT, in his official capacity as
Governor of Texas; JOHN SCOTT, in his
official capacity as Secretary of State of
Texas,

Defendants.

CIVIL ACTION NO.
1:21-cv-01006
[Consolidated case]

FAIR MAPS TEXAS ACTION
COMMITTEE, OCA-GREATER
HOUSTON, NORTH TEXAS CHAPTER
OF THE ASIAN PACIFIC ISLANDER
AMERICANS PUBLIC AFFAIRS
ASSOCIATION, EMGAGE, KHANAY
TURNER, ANGELA RAINEY, AUSTIN
RUIZ, AYA ENELI, SOFIA SHEIKH,
JENNIFER CAZARES, NILOUFAR
HAFIZI, LAKSHMI RAMAKRISHNAN,
AMATULLA CONTRACTOR, DEBORAH

CIVIL ACTION NO.
1:21-cv-01038
[Consolidated case]

CHEN, ARTHUR RESA, SUMITA)
GHOSH, and ANAND KRISHNASWAMY,)
<i>Plaintiffs,</i>)
)
v.)
)
GREG ABBOTT, in his official capacity as)
Governor of Texas; JOHN SCOTT, in his)
official capacity as Secretary of State of)
Texas,)
)
<i>Defendants.</i>)

LULAC PLAINTIFFS’ UNOPPOSED MOTION
FOR EXTENSION OF TIME TO RESPOND TO DEFENDANTS’ MOTION TO
DISMISS, FOR A MORE DEFINITE STATEMENT, OR TO STRIKE

Plaintiffs League of United Latin American Citizens, *et al.* (“LULAC Plaintiffs”) file this unopposed motion for an extension of time until December 6, 2021 to respond to Defendants’ Motion to Dismiss, for a More Definite Statement, or to Strike, Dkt. 12. In support of this motion, LULAC Plaintiffs show that:

1. Defendants filed their motion on November 15, 2021. *Id.*
2. Pursuant to this Court’s Local Rule CV-7(D)(2), LULAC Plaintiffs’ deadline to respond to the motion is 14 days after that date, or November 29, 2021.
3. However, pursuant to Federal Rule of Civil Procedure 15(a)(1)(B) and this Court’s Local Rule CV-15(a), LULAC Plaintiffs’ deadline to amend their complaint as a matter of course is December 6, 2021.
4. LULAC Plaintiffs intend either to respond to Defendants’ motion or to amend their complaint as a matter of course. Accordingly, so that there can be a single deadline for

their response, LULAC Plaintiffs request an extension of their deadline to respond to Defendants' motion until December 6, 2021.

5. LULAC Plaintiffs do not seek this motion for delay, but for good cause. Further, this motion will not prejudice Defendants or other Plaintiffs.
6. Defendants and other Plaintiffs do not oppose the requested extension.
7. For the reasons set forth above, LULAC Plaintiffs respectfully request an extension of time to file their response to Defendants' motion through December 6, 2021.

Dated: November 24, 2021

Respectfully submitted,

/s/ Nina Perales

Nina Perales

Mexican American Legal Defense and
Educational Fund

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San Antonio, TX 78205

(210) 224-5476

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CERTIFICATE OF CONFERENCE

I hereby certify that, on November 23, 2021, counsel for the LULAC Plaintiffs conferred with counsel for Defendants and other Plaintiffs regarding the above motion. Counsel for Defendants and other Plaintiffs indicated they do not oppose the motion.

/s/ Nina Perales

Nina Perales

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that she has electronically submitted a true and correct copy of the above and foregoing via the Court's electronic filing system on the 24th day of November 2021.

/s/ Nina Perales

Nina Perales